

EXHIBIT C

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21 Attorneys for Defendant,

22 **FCA US LLC**

23 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

24 **MARGARITA VELASQUEZ,**

25 Case No.: 2:21-cv-05092-JFW-AGR

26 Plaintiff,

27 v.

28 **FCA US LLC, a Delaware Limited
Liability Company; and DOES 1
through 10, inclusive,**

Defendant.

**STIPULATION REGARDING
PLAINTIFF'S ATTORNEY'S FEES,
COSTS AND EXPENSES**

Honorable Judge John F. Walter

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Plaintiff MARGARITA VELASQUEZ (“Plaintiff”) and Defendant FCA US
3 LLC (“Defendant”) (collectively, “the Parties”), by and through their respective
4 counsel of record, hereby enter into the following stipulation for entry of an Order
5 by the Court as follows:

6 WHEREAS, this matter was settled on or about August 31, 2021.

7 WHEREAS, per the Rule 68 Offer entered into by the Parties, Defendant
8 agrees that the judgment may include an award of attorneys’ fees, costs and expenses
9 recoverable by agreement between the parties or motion as allowed by law.

10 WHEREAS, the Parties now seek to resolve the issue of Plaintiff’s attorney’s
11 fees, costs and expenses without further litigation on terms just and fair to all parties
12 and hereby enter into the following Stipulation of Attorney’s Fees, Costs and
13 Expenses (“the Stipulation”).

14 **THEREFORE, THE PARTIES HEREBY STIPULATE TO THE
15 ENTRY OF AN ORDER AS FOLLOWS:**

- 16 (1) That Defendant shall pay the sum of \$8,250.00 to Plaintiff and Plaintiff
17 hereby agrees to accept said payment in full satisfaction of all claims for
18 attorney’s fees, costs and expenses in connection with this action;
- 19 (2) That Defendant shall pay the sum of \$8,250.00 to Plaintiff within 60 days
20 of August 31, 2021 unless matters outside of the control of Defendant
21 cause delay;
- 22 (3) Each of the undersigned represents that he or she has been duly authorized
23 to enter into the Stipulation.

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1 **IT IS SO STIPULATED.**

2 Dated: September 3, 2021

3 **KNIGHT LAW GROUP, LLP**

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5 */s/ Daniel Kalinowski*
6 Steve Mikhov (SBN 224676)
7 Daniel Kalinowski (SBN 305087)
8 Attorneys for Plaintiff,
MARGARITA VELASQUEZ

9 Dated: September 3, 2021

10 **ROSEWALDORF LLP**

11
12 */s/ Mark Skanes*
13 Michael J. Gregg (SBN 321765)
14 Mark W. Skanes (SBN 322072)
15 Attorneys for Defendant,
FCA US LLC